

# **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In Re: Equifax Inc. Customer Data  
Security Breach Litigation

Case No. 1:17-md-02800-TWT

CONSUMER ACTIONS

**DECLARATION OF JENNIFER M.  
KEOUGH REGARDING  
CORRESPONDENCE FROM  
ROBERT JOSEPH WHITEMAN, JR.**

I, JENNIFER M. KEOUGH, declare as follows:

1. I am the Chief Executive Officer (“CEO”) of JND Legal Administration LLC (“JND”), the company appointed to serve as the Settlement Administrator in this case. This Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees and counsel for the Plaintiffs and Defendants.

2. I previously filed a Declaration Regarding Proposed Administration Program, dated July 22, 2019, Docket No. 739-6, and a Supplemental Declaration Regarding Implementation of Settlement Administration Program, dated December 5, 2019, Docket No. 900-4. This additional Declaration addresses correspondence to the Court from Robert Joseph Whiteman, Jr. (“Mr. Whiteman”) (Docket No. 1199).

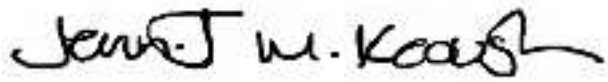
3. JND has received several inquiries from Mr. Whiteman, starting with his first correspondence to us in April 2020. JND previously sent him a Settlement Notice and responded to an inquiry that was received from him on January 27, 2021.

4. Mr. Whiteman expressed disappointment in his letter that he has not yet been compensated under the Settlement. However, the Effective Date of the Settlement has not yet been triggered because appeals challenging this Court's final approval of the Settlement remain pending. (*See* Settlement Agreement, ¶ 17.1.5, Docket No. 739-2, at pg. 34-35). No payments may be made under the Settlement, and no Settlement benefits can begin (such as credit monitoring and identity restoration services) until those appeals are resolved. JND explained this to Mr. Whiteman in our response to his January 27, 2021 inquiry.

5. JND will continue to assist claimants such as Mr. Whiteman and respond to Settlement questions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 23, 2021 in Seattle, Washington.

A handwritten signature in black ink, appearing to read "Jennifer M. Keough", written over a horizontal line.

JENNIFER M. KEOUGH